REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Preliminary Matter

Pursuant to a new Power of Attorney filed herewith, Applicant appoints Osha·Liang LLP to represent Applicant in this case. Accordingly, please change the attorney docket number to **09428/183001** and send future communications to the address associated with customer number 22511.

Disposition of Claims

Claims 1-3, 6-39, and 43-48 were pending in this application. Claims 1, 18, 27, 33, 39, and 45-48 are independent. The remaining claims depend, directly or indirectly, from claims 1, 18, 27, 33, 39, and 45-48. Claims 45-48 have been cancelled by this reply. Therefore, claims 1-3, 6-39, and 43-44 are pending after these amendments.

Claim Amendments

Claims 1-3, 6-17, and 33-38 have been amended to recite computer hardware for storing UI view definitions, executing various components of the invention (*e.g.,* the UI view manager), and for performing various functions (*e.g.,* dynamically editing at run-time the user interface). Support for these amendments may be found, for example, in Figure 17 and the corresponding text in the instant specification. Further, claims 1, 6, 12, 18-21, 27-30, 33-36, and 39 have been amended to clarify that the user interface is dynamically generated at run-time from the UI view definitions. Further, one or more of the aforementioned claims have been amended to clarify

that the user interface (including the various controls) may be dynamically modified at run-time. Support for these amendments may be found, for example, in paragraphs [0074], [0091], [0093], [0112], [0116], [0118], [0154], and [0169] of the instant specification. The Applicant respectfully asserts that no new matter has been added by this amendment.

Rejection(s) under 35 U.S.C. §101

Claims 1-3, 6-17, 33-38, and 45-48 stand rejected under 35 U.S.C. §101. Claims 45-48 have been cancelled by this response. Accordingly, this rejection is now moot with respect to claims 45-48. To the extent that this rejection applies to the pending amended claims, the rejection is respectfully traversed.

As discussed above, claims 1-3, 6-17 and 33-38 have been amended to recite computer hardware for storing UI view definitions, executing various components of the invention (*e.g.,* the UI view manager), and for performing various functions (*e.g.,* dynamically editing at run-time the user interface) as requested by the Examiner. Accordingly, the amended claims are now directed to statutory subject matter. In view of the above, withdrawal of this rejection is respectfully requested.

Rejection(s) under 35 U.S.C. §102

Claims 1-3, 6-39 and 43-48 stand rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent Application Publication No. US2002/0085020 ("Carroll"). Claims 45-48 have been cancelled by this reply. Thus, this rejection is now moot with respect to the aforementioned cancelled claims. To the extent that this rejection applies to the pending amended claims, this rejection is respectfully traversed.

In order to anticipate a claim, the prior art must teach or suggest all the aspects of the claim, either explicitly or impliedly. The Applicant respectfully asserts that Carroll does not teach or suggest all the limitations of the pending amended claims. Specifically, amended independent claim 1 is directed a computer system that includes a UI view manager configured to dynamically generate, at run-time, a user interface. Thus, after the source code for the underlying application has been compiled and deployed onto a computer system, the user may define a UI view definition and then once the underlying application is started may initialize the user interface using the UI view definition (*See* Instant Specification, Figure 7). As shown in Figure 7, during the initialization of the user interface, the system loads the UI view definition (while in run-time mode) and then proceeds to initialize the various panels and controls in the user interface (*i.e.,* a graphical interface that allows the user to interact with the underlying application) using the UI view definition. Once the initial user interface is initialized and displayed to the user, the user may then dynamically edit, during run-time, various portions of the user interface by modifying the underlying UI view definition file. This editing may include modifying, adding, and removing various portions of the user interface including, but not limited to, panels and controls (both wrapper controls and standard controls). Further, the user may define a new UI view definition and then initialize the user interface using the new UI view definition (*See e.g.,* Instant Specification, Figures 8-14).

In contrast, Carroll is directed to a system for defining a graphical user interface during application development using an XML representation and then during compilation, using the XML representation to determine which pieces of user interface code to obtain from the related AWT and Swing libraries for compilation along with the application source code. The result of the aforementioned compilation processes is a complete application that includes a static graphical user interface. (*See* Carroll, Abstract, [0019], [0188], [0253]). Further, if the user

wishes to change any portion of the user interface, in accordance with the teachings of Carroll, the user must edit the XML representation and then recompile the application. (*See* Carroll, [0263] and [0268]). In view of the above, Carroll clearly does not teach or suggest any functionality to allow a user to dynamically change the user interface at run-time; rather, Carroll is limited to modifying the user interface by stopping, modifying the XML representation, and then re-compiling the application with the modified XML representation.

Moreover, even assuming *arguendo* that Carroll teaches modifying the XML representation of the user interface during run-time, Carroll provides no teaching or suggestion of how such modifications to the XML representation may be used to modify the user interface without stopping and re-compiling the application using the modified XML representation.

The Applicant does note that Carroll asserts that "[c]hanging an application's user interface does not require recompiling the application. Developers can edit the XML documents, and immediately see the results when they re-run their application." (*See* Carroll, [0276]). However, there is no teaching or suggestion in Carroll of how this may be done. Further, the aforementioned statement is in direct conflict with detailed discussion of how the user interface in Carroll is created during compilation of the application. Moreover, the Applicant respectfully asserts that the mere statement in Carroll that the XML representation be changed and the result reflected in the application, without any teaching or suggestion of how this may be done, is not sufficient to anticipate amended independent claim 1. *See Elan Pharm., Inc. v. Mayo Found. For Med. Educ. & Research*, 346 F.3d 1051, 1054 (Fed. Cir. 2003) (holding that a patent claim cannot be anticipated by a prior art reference if the allegedly anticipatory disclosure cited as prior art is not enabled).

In view of the above, amended claim 1 is patentable over Carroll. Further, independent claims 18, 27, 33, and 39 are patentable over Carroll for at least the same reasons as amended

claim 1. In addition, dependent claims are patentable over Carroll for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09428/183001).

Dated: July 20, 2005

Respectfully submitted,

By _____

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